

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of TexasUnited States Courts
Southern District of Texas
FILED

MAR 27 2014

David J. Bradley, Clerk of Court

United States of America

v.

Robert James Talbot Jr

Case No.

H14-321 MJ

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 8, 2013 - March 27, 2014 in the county of Harris in theSouthern District of Texas, the defendant(s) violated:

Code Section

Offense Description

- (1) 18 USC Section 373 (a)
- (2) 18 USC Section 1951 (a)
- (3) 18 USC Section 842 (a)(3)(A)

(1) whoever, with intent that another person engage in conduct constituting a felony that has an element the use, attempted use or threatened use of physical force against property or against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicits, commands, induces or otherwise endeavors to persuade such other person to engage in such conduct. (2) whoever in any way or degree obstructs, delays, or affects commerce, by robbery or extortion or physical violence to any person or property in furtherance

This criminal complaint is based on these facts:

See attached Affidavit of Criminal Complaint

☒ Continued on the attached sheet.


Complainant's signature

Bryan M. Ellis, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

March 27, 2014



Judge's signature

City and state:

Houston, Texas

Frances H. Stacy, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT FOR CRIMINAL COMPLAINT:

I, Bryan M. Ellis, hereinafter referred to as affiant, am a Special Agent with the Federal Bureau of Investigation (FBI). I am currently assigned to the FBI Houston Domestic Terrorism Joint Terrorism Task Force where I have been tasked with investigating Domestic Terrorism investigations. I have been employed with the FBI since 2010. I have participated in numerous investigations of Domestic Terrorism, utilizing court ordered pen, trap and trace, federal grand jury subpoenas, consensual Title IIIs and undercover operations. Through my training, education and experience, I have become familiar with domestic terrorists, to include militia extremists' plans and how they conduct their operations. I submit this Affidavit in support of a complaint charging Robert James Talbot Jr with Unlawful Acts in violation of Title 18 USC Section 842(a)(3)(A) & 844(d) - Unlawful Acts - Receipt and transport of explosive materials; Title 18 USC Section 373, Solicitation to Commit a Crime of Violence; and Title 18 USC Sections 1951 and 2, Attempt to Interfere with Commerce by Robbery and Interference with Commerce by Robbery, and Aiding and Abetting.

As this Affidavit is submitted for the limited purpose of establishing probable cause to believe that Robert James Talbot Jr has engaged in the aforementioned criminal violation, I do not set forth every fact about the investigation known to me. Instead, I set forth the following facts which demonstrate that there is probable cause to believe Robert James Talbot Jr did knowingly transport, ship, cause to be transported, or receive any explosive material, solicit to commit a crime of violence and attempted to interfere with commerce by threats or violence.

BACKGROUND

Since August 2013, Special Agents of the FBI have been conducting an investigation into Robert James Talbot Jr as he espoused his desire to recruit 5-6 other like-minded individuals to blow up government buildings, rob banks and kill law enforcement officers. During the course of the investigation, a Confidential Human Source (CHS1) has provided information to Agents. CHS1's information was corroborated by Agents through surveillance, consensual recordings, and other investigative techniques, which have proven to be reliable.

As a result of the investigation Robert James Talbot (Talbot) has been positively identified by Agents through information obtained by CHS1 and FBI Undercover Employees (UCE1 and UCE2). This information was corroborated by law enforcement surveillance and government database checks.

On August 27, 2013 Talbot met with CHS1 and discussed his desire to rob banks and kill law enforcement because they are no longer oath keepers and their badges "no longer hold water". Talbot plans to utilize the money from robbing banks to purchase better weapons and equipment for his "Resistance" group.

On October 15, 2013, Talbot told CHS1 that he (Talbot) would be starting a "black market" job of converting weapons from semi-automatic to full automatic. Talbot advised that he (Talbot) would do the conversions and sell them to other militia members for a profit.

On October 18, 2013, Talbot asked CHS1 about his/her availability to walk away from CHS1's current employment and set in motion the initial stage of Talbot's plan to rob banks. Talbot posted on Facebook that he (Talbot) had gone to four Bank of Americas to "play observation". Talbot encouraged anyone who robs these banks to kill everyone working for the "banking cartels" during the heist. Talbot claimed, "That is exactly what I will have my men do during the heist". Talbot also stated on Facebook "Same goes with the Muslims. Mosques are to be a blast! With three of my guys with FA (full automatic) AK's (AK-47), we will send that white house worthless piece of dirt and his Muslim brotherhood a message they will never forget".

On November 21, 2013, Talbot notified a FBI Online Undercover Employee (OCE1) that he (Talbot) created a Facebook page titled "American Insurgent Movement" (AIM). Talbot described the Facebook page as "a Pre-Constitutionalist Community that offers those who seek True patriotism and are looking for absolute Freedom by doing the Will of God. Who want to restore America Pre-Constitutionally and look forward to stopping the Regime with action by bloodshed."

On January 2, 2014, Talbot instructed CHS1 to start watching violent war movies to mentally prepare for killing people. Talbot told CHS1 to be patient because they needed to continue to recruit and train before they can conduct bank robberies. On or about January 7, 2014, during an on-line chat, Talbot told CHS1 to start looking at Bank of America and Chase banks that they can start to hit. Talbot explained they need "funds for our operations and I need larger weapons which I can get my hands on".

On January 18, 2014, Talbot asked OCE1 to acquire hand grenades and 25-50 pounds of composition 4 (C4) explosives.

On January 22, 2014, Talbot met with UCE1 and UCE2 at restaurant in Katy, Texas. Talbot told UCE1 and UCE2 he (Talbot) wanted to begin robbing banks in order to acquire money to finance the purchasing of better weapons and equipment which he (Talbot) would use to kill law enforcement and government officials in Washington D.C.

On January 30, 2014, Talbot posted on the AIM Facebook page "Liberty movement starts this summer for those who are up for anything. Email the admin if your interested in walking away from your life (we have weapons if you need a weapon) to stop the Regime. We always will be recruiting...You will be giving your life for a greater nation restoring liberty and the Lord himself. Stopping the New World Order and banking cartels". On January 31, 2014, Talbot posted on AIM Facebook page "Operation Liberty is going in full effect this summer if your sick of your life style and want to make a difference

then email a admin". On February 2, 2014, Talbot posted on AIM "We will show them Liberty Unit 1 and Unit 2...We will show them what creating Liberty is really like and anyone who stand in our path like a cop. Will be SHOWN EXTREME prejudice". On February 9, 2014, Talbot posted on AIM "Looking ONLY for ex-military or self-trained men who trained in guerrilla warfare and understand war/battle to the fullest. I cannot take someone whom doesn't understand what war/battle is or like. Let alone cannot follow a order when shooting someone at point blank range, which will happen. That cannot handle seeing body parts flying everywhere..That isn't afraid to pull the trigger especially when given that order. I don't need someone freezing up when bullets are whizzing past there head and jeopardize the rest of the team. I can train you, but I have no time to put that much effort into someone mentally to handle blood and killing". On February 14, 2014, TALBOT replied to a post on AIM "That's ok Operation Liberty is paying a visit to there full Mosques. That should make new". On February 19, 2014, Talbot posted the video "Actual Bank Robbery in Detroit -Absolutely Priceless". Above the post Talbot wrote "soon it will be me and my teams turn".

On February 20, 2014, Talbot met with UCE1 and UCE2 and stated they (Talbot, UCE1 and UCE2) needed to be prepared to ambush and kill the "cop" that arrested him for driving while under the influence in January 2014. Talbot told the UCEs he (Talbot) knows where the "cop" patrols and he (Talbot) already has it planned. Talbot advised they would kill the "cop" late at night and wait for other police to arrive and kill all of them. On March 15, 2014, Talbot reiterated during a meeting with CHS1, he (Talbot) would not leave town after conducting the armor car robberies because he (Talbot) wanted to kill his probation officer and trooper that arrested him for driving while intoxicated.

Talbot expressed to OCE1, UCE1 and UCE2 that he wanted to acquire Composition 4 (C4) explosives and dynamite to be used during the commission of the bank robberies. Talbot instructed UCE1 and UCE2 to rent a storage facility under a fictitious name to store the stolen explosives.

During the time period between March 11, 2014 through March 13, 2014, consensual monitoring was conducted with the UCEs. Talbot stated he has researched on-line how to create shape charges by using C4 and metal. He intended to use the shape charges during the armor car robberies to penetrate the locking mechanism of the armored doors. Talbot told UCEs he has researched targets as well as mapped out escape routes after robbing the armor vehicles. Talbot also told UCE1 that he would assist in the facilitation of the operation by providing UCE1 with approximately \$500.00 for the manufacture of eight explosive devices, to include: 2 one pound shape charges and 6 half pound shape charges. Talbot requested UCEs acquire at least 6 hand grenades. Talbot said he would tape the hand grenade to the armor car driver's door and kill the driver, preventing the vehicle from leaving during their heist.

Through consensual monitoring, Talbot has tasked the UCEs to sit in a parking lot with a video camera and observe armored vehicles patterns during pick up deposits made at the banks.

On March 15, 2014, Talbot posted on the AIM Facebook page "In a few weeks me and my team are goin active for Operation Liberty...I will not be able to post no more. We will be the revolution, things will happen nation wide or in the states. They will call us many names and spin things around on media. Just remember we fight to stop Marxism, liberalism, Central banking Cartels and the New World Order. I will try to find someone to take over this community page, but most of the guys who are admins are part of my unit. I will have a website up in 2 months...The funding is unlimited since the banking cartel will be forced to fund our movements".

On March 20, 2014, Talbot conducted surveillance of a Bank of America in Harris County, Texas. Talbot was observed with binoculars in the area of the bank monitoring the movements of people entering and exiting the bank. Talbot moved his vehicle to different parking lots in the area of the bank to provide different views of the bank. (Talbot's actions were video recorded by the FBI.)

On March 20, 2014, after Talbot conducted surveillance of the Bank of America, during a consensually recorded conversation, Talbot told UCEs he (Talbot) was following an armored car. Talbot provided a description of the armored car and details of how the personnel exited the vehicle and whether the carrier was picking up or dropping off bags.

On March 22, 2014, Talbot conducted surveillance of a financial institution location in northwest Houston for approximately two hours. On March 22, 2014, Talbot sent \$500 to the UCEs via Money Gram as a down payment for the explosive devices he had requested during the consensually monitored conversations on March 11-13, 2014. On March 22, FBI Agents received the received the \$500 MoneyGram sent by Talbot to "Bryan Davis". The money was placed in evidence.

On March 24, 2014, Talbot sent CHS1 a text message stating he (Talbot) quit his job. During a consensually monitored conversation, UCE1 asked Talbot if he was serious about conducting the armor car robbery on March 27, 2014. Talbot responded, "I didn't quit my job for shi*** and giggles."

During the same meeting on March 24, 2014 with CHS1, Talbot said he (Talbot) would provide detailed maps for each member of the group on March 26, 2014. Talbot said he wanted to place bomb on the side of the armor car and he would kill the driver.

On March 24, 2014, Talbot posted the following on Facebook, "The banking cartel is not going to stop with their agenda, and only we can stop them and their agenda by taking what they loved most and using it against them for our own missions." He also stated, "prove yourself and join my cause which has gone active."

On March 26, 2014, Talbot met with UCE1, UCE2, and CHS1. Talbot was shown the "stolen" explosives (inert) he requested and the eight explosive devices he paid \$500 to a "Bryan Davis." Talbot then provided UCE1, UCE2, and CHS1 maps of the area he plans to conduct the armor car robbery on March 27, 2014. Talbot then guided the group for over three hours showing all participants the location he wanted to conduct the armor car robbery and escape routes through residential neighborhood. Talbot explained how he would kill the driver of the armor car to prevent the truck from leaving the location. An explosive device would be used to defeat all of the door-locking mechanisms. According to Talbot, they would then steal all the money they could remove from the armor car.

On March 27, 2014, Talbot, UCE1, UCE2 and CHS1 met at a storage facility in Houston, Texas with the intent to conduct an armor car robbery that morning of the location Talbot identified on March 22, 2014. Talbot provided detailed maps of the target financial institution as well as escape routes in order to quickly evade law enforcement. Talbot placed two explosive devices made of C4 into his black back pack. Talbot instructed the group how to block the armor car with their vehicle to prevent it from leaving the location. Talbot stated he would place the explosive device on the vehicle. Talbot provided a "manifesto" which he had UCE1 read to the group, "We must rebel. There is no other option no. Blood and bullets are the only two things that will change this world, short of divine action." While in route to conduct the armor car robbery in northwest Houston, Texas, Talbot was arrested by the FBI Houston Division Special Weapons and Tactics team.

[INTENTIONALLY LEFT BLANK]

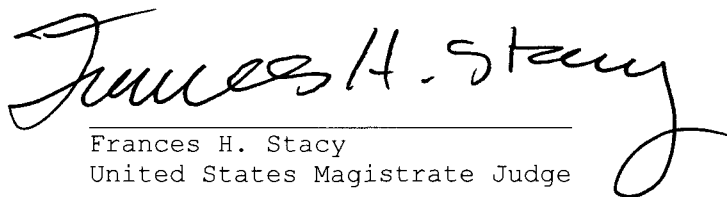
Conclusion

Based on the evidence described above, I believe probable cause exists that from on or about August 27, 2013, to the date of this affidavit, in the Southern District of Texas, Robert James Talbot Jr has knowingly conspired to transport, ship, cause to be transported or received any explosive materials, solicited to commit a crime of violence, and attempted to interfere with commerce by threats or violence. In consideration of the foregoing, your affiant respectfully requests that this court issue a warrant authorizing the arrest of Robert James Talbot Jr.



Bryan M. Ellis, Special Agent
Federal Bureau of Investigation
Houston Division

Subscribed and sworn to before me this 27 day of March, 2014, and I find probable cause for this Criminal Complaint.



Frances H. Stacy
United States Magistrate Judge